

STATE COURT OF RICHMOND COUNTY
STATE OF GEORGIA

CIVIL ACTION NUMBER

Taylor, Rhonda

PLAINTIFF

VS.

Georgia-Pacific, LLC through its agent for
service
Swing Transport, Inc.
Doe, John

DEFENDANTS

SUMMONS

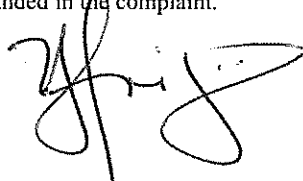
TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

David Bell
David B. Bell, P.C.
619 Greene Street
Augusta, Georgia 30901

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 20th day of June, 2018.


Deputy Clerk of Court

CLERK OF SUPERIOR COURT
AND JUDGE
18 JUN 22 4:12:59
CLERK, RICHMOND CO., GA.

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	PATRICIA W. BOOKER
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	COMPLAINT

CLERK OF SUPERIOR COURT
AND JUDICIAL OFFICE
18 JUN 22 PM 12:59
CLERK, RICHMOND CO., GA.

COMES NOW Plaintiff, by and through counsel, and for his cause of action against the Defendants, and shows the Court as follows:

1. The First Defendant, Georgia-Pacific, LLC has CT Corporation System, 289 S. Culver Street, Lawrenceville, GA 30046 as its agent for service. The First Defendant may be served with process by serving its agent for service. As to First Defendant, venue lies in this County and jurisdiction exists with this Court.

2. The Second Defendant, Swing Transport, Inc. has Denise S. Durham, 103 Indian Wells Circle, Lexington, North Carolina 27295 as its registered agent. The Second Defendant may be served with process by serving its agent for service. As to the Second Defendant, venue lies in this County and jurisdiction exists with this Court.

3. The Third Defendant, John Doe, is an unknown Georgia resident who is responsible for the injuries suffered by Plaintiff.

4. On or about May 11, 2017, First Defendant and Second Defendant, with the help of the unknown John Doe, Third Defendant, negligently loaded a tractor trailer (“the trailer”) in Spartanburg, South Carolina.

5. The trailer was loaded with boxes to be transported from First Defendant’s facility in Spartanburg to Kellogg/Keebler Company/Augusta Bakery, 1550 Marvin Griffin Road, Augusta, Georgia 30906.

6. Second Defendant’s driver transported the trailer from Spartanburg to Augusta, Georgia.

7. On or about May 11, 2017, Rhonda Taylor as an employee of Kellogg Company/Keebler Company/Augusta Bakery in Augusta opened the door of the trailer.

8. When Rhonda Taylor opened the door to the trailer, the cargo negligently fell out onto him, thereby negligently injuring him and causing him personal injury.

9. As the result of Defendants’ negligence, Plaintiff, Rhonda Taylor, suffered personal injury, required medical care, incurred medical bills, missed time from work, lost wages and experienced pain and suffering of mind and body.

NOW, THEREFORE, Plaintiff prays as follows:

- A. That process issue and that the Defendants be served as required by law;
- B. That Plaintiff have judgment against the Defendants in an amount deemed

by the jury to fully and adequately compensate the Plaintiff for the injuries suffered by him;

C. That all issues of fact be tried to a jury, and that all costs of this action be taxed against the Defendants.

This 21st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

CLERK OF SUPERIOR COURT
AND COUNTY CLERK
18 JUN 22 PM 12:59
CLERK OF SUPERIOR COURT
AND COUNTY CLERK

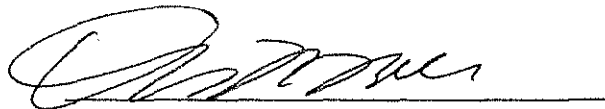
In accordance with the applicable rules and statutes governing practice and procedure relating to discovery, you are required to answer separately and fully in writing, under oath and within the time required by law, the Interrogatories attached hereto as Exhibit "A". These Interrogatories shall be deemed continuing so as to require supplemental answers if further information is obtained between the time answers are served and the time of trial.

As used herein, the term "you" shall refer to the Defendant, his agents, employees, officers, investigators and attorneys. In the event any information requested is privileged, Defendant is requested to state the grounds for such privilege.

As used herein, the term "identify" when used in reference to a person means that the Defendant is required to state the name, and last known address. When used with reference to a document, Defendant shall describe said document and state the person or persons who have custody thereof including the last known address and telephone number of such person or persons.

Further, as used herein, the term "document" shall refer to any written memorandum, letter report, statement, photograph, drawing, map, contract, or other written instrument or a copy of any of the foregoing in the event the copy is different from the original, plus any tape recording or other means of electronic or photographic reproduction.

This 21st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
Attorney for Plaintiff

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

EXHIBIT "A"

1. State your complete legal name for the past five (5) years.
2. Identify all persons known to you who have or claim to have knowledge of facts relevant to the issues formed by the pleadings in this action, and the incident referenced therein, including but not limited to the persons who loaded the truck and the person(s) who transported the truck from South Carolina to Augusta, Georgia.
3. Identify any expert witness(es) whom you expect to call at the trial of this case.
4. With respect to each such expert, please provide the following:
 - (a) The subject matter of which the expert is expected to testify;
 - (b) The substance of the facts and opinions to which the expert is expected to testify;
 - (c) A summary of the grounds for each opinion.
5. Do you contend that the negligence of any person, firm, corporation or other entity caused or contributed to the damages sought to be recovered by the plaintiff herein? If so, please identify each such person, firm, corporation or other entity and describe in detail the negligence and the manner in which such negligence contributed to the said damages. In this regard, please state every fact upon which you base your defense that plaintiff failed to exercise ordinary care for his own safety, failed to avoid the consequences of Defendant's alleged negligence, and was guilty of negligence which

was either the sole proximate cause of his injuries or was at least equal to if not greater than any negligence alleged against the Defendant.

6. Do you claim that there exists any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of any judgment which may be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment? If so, please state the name of the insurance business, provide the policy number, the policy limits and state whether or not such insurance business is providing you with a defense in this claim; and, if so, also please state whether there has been a reservation of rights made by the insurer.

7. Identify any person who has in any manner participated in any investigation pertaining to any issue arising out of the incident involved in this case. For each person identified in response to this interrogatory, state the substance of any facts or information acquired as a result of such person's participation in any such investigation.

8. Please state the name, addresses, telephone numbers and places of employment of all persons known to you, either from your investigation or from any investigation made on your behalf who have knowledge of the issues involved in this case.

9. Are you aware of the existence of any written, recorded or transcribed statements made by anyone concerning this action or the subject matter of this action? If so, please identify each such statement, the date taken, by whom taken and the names and addresses of all persons presently having copies of same.

10. List and describe in specific detail each and every document, piece of correspondence, report or other writing which contains information which concerns the subject matter of this action.

11. Identify any photographs, charts, diagrams, plats, drawings, moving pictures, videotapes, models or other depictions (whether prepared by you or not) which depict any scene, object or person which is or may be relevant to any matter involved in this case.

12. State in detail and in narrative form your version of the facts of the incident which is alleged in Plaintiff's complaint, giving specific details and proper sequence of events, including every factual contention upon which you base any defense as set out in your answer to said complaint.

13. Identify all eyewitnesses to the incident which gave rise to this lawsuit.

14. State whether Plaintiff, or any agent of Plaintiff, has made any statements in any form regarding any phase of the incident referred to in the captioned suit or the injuries resulting therefrom and give the name and address of the person or persons to whom each such statement was made, the date and form of each such statement, and the name and address of the person(s) presently having possession, custody, or control of each such statement.

15. If Defendant or any representative of Defendant obtained statements from any person who has or claims to have knowledge of any relevant facts concerning any of the issues involved in the captioned suit, state whether such statement was oral, written,

or recorded, and give the name and address of the person who gave the statement, the date and place the statement was made, the name and address of each person present when the statement was made, and the name and address of each person who has present custody of each written statement, recording of an oral statement or a transcript of a reported or recorded statement.

16. State whether you or anyone on your behalf prepared a report of the incident complained of. State whether you or anyone on your behalf filed a report of this incident with any party whomsoever, and give the name and address of the person with whom such report was filed and/or the name and address of the person who has custody of such report.

**EXHIBIT "B" :
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT**

Pursuant to the provisions of Official Code of Georgia Annotated Section 9-11-34, you are hereby requested to produce the documents described below, by mailing a copy of all such described documents to the undersigned attorney, David B. Bell, P. O. Box 1011, Augusta, Georgia, 30903-1011, within thirty (30) days following your receipt of this request.

1. Original or true copies of all policies of insurance identified in your response to Interrogatory No. 4 of Plaintiff's First Interrogatories which do or may provide any coverage as to any of the injuries or damages claimed in this action. This request directs itself to the entire policy.

2. All surveillance or investigatory material which depicts or attempts to depict or is claimed to depict any issue raised in this action.

3. All written, recorded or transcribed statements of any witness (including any expert witness) or other person (including Plaintiff or any agent of Plaintiff) concerning the subject matter of this action as identified in your responses to Interrogatories 7, 12, and 13 of Plaintiff's First Interrogatories.


4. All documents, correspondence, reports or other writings concerning the subject matter of this action identified in your response to Interrogatory No. 8 of Plaintiff's First Interrogatories.

5. All depictions of any scene, object or person which is or may be relevant to any subject matter of this action as identified in your response to Interrogatory No. 9 of Plaintiff's First Interrogatories.

6. All reports of this incident identified in your response to Interrogatory No. 14 of Plaintiff's First Interrogatories.

7. Any report identified in your answers to these Interrogatories.

This 21st day of June, 2018.



DAVID B. BELL
ATTORNEY FOR PLAINTIFF
STATE BAR NO. 047750

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

CLERK OF SUPERIOR, STATE
AND JUVENILE COURT
FILED FOR RECORD

2018 AUG 24 PM 4:46

KATIE HOLMES SULLIVAN
CLERK, RICHMOND CO., GA.

RHONDA TAYLOR,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION FILE NO.
)	2018-RCSC-00850
GEORGIA-PACIFIC, LLC,)	
)	
First Defendant,)	
)	
SWING TRANSPORT, INC.,)	
)	
Second Defendant.)	
)	
JOHN DOE,)	
)	
Third Defendant.)	
_____)	

ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT

NOW COMES Defendant Georgia-Pacific LLC, incorrectly identified above as Georgia-Pacific, LLC, (hereinafter "GEORGIA-PACIFIC") and serves this responsive pleading, showing to the Court as follows:

First Defense

Plaintiff's Complaint fails to state a claim upon which relief can be granted against GEORGIA-PACIFIC and GEORGIA-PACIFIC should be dismissed.

Second Defense

No act or omission by GEORGIA-PACIFIC or its employees or agents proximately caused Plaintiff's alleged injuries and damages. The actions of Plaintiff proximately caused any damages claimed by Plaintiff.

Third Defense

At no relevant time did GEORGIA-PACIFIC breach any duty to Plaintiff or Plaintiff's spouse.

Fourth Defense

Plaintiff's Complaint fails and should be dismissed or transferred on the grounds and to the extent that either jurisdiction and/or venue are not proper in this Court.

Fifth Defense

The negligence and/or fault of Plaintiff equals or exceeds any purported fault of others, and Plaintiff's claims are barred by the doctrine of contributory and/or comparative negligence.

Sixth Defense

Plaintiff failed to exercise reasonable care for his own safety, thus Plaintiff is precluded from recovering from GEORGIA-PACIFIC.

Seventh Defense

Plaintiff has failed to join a necessary and/or interested party.

Eighth Defense

GEORGIA-PACIFIC asserts all affirmative defenses to the Complaint that are or may be available to it under O.C.G.A. § 9-11-12(b).

Ninth Defense

GEORGIA-PACIFIC reserves the right to plead and prove such other defenses, including but not limited to those allowed by O.C.G.A. § 9-11-8, as may become known during the course of investigations and discovery.

Tenth Defense

RESPONSIVE PLEADING

Responding to the individually numbered paragraphs of Plaintiff's Complaint, GEORGIA-PACIFIC responds as follows:

1. GEORGIA-PACIFIC admits the allegations contained within the first two (2) sentences of Paragraph 1 of Plaintiff's Complaint. Any allegations set forth within said Paragraph 1 of Plaintiff's Complaint that have not been expressly admitted or denied above, are hereby denied.

2. GEORGIA-PACIFIC lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations stated in Paragraph 2 of Plaintiff's Complaint and it therefore denies them.

3. GEORGIA-PACIFIC lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations stated in Paragraph 3 of Plaintiff's Complaint and it therefore denies them.

4. Denied.

5. Responding to the allegations set forth within Paragraph 5 of Plaintiff's Complaint, GEORGIA-PACIFIC admits only that on or about May 6, 2017, a truck was loaded with boxes to be transported from a facility in Spartanburg to Kellogg Snacks, 1550 Marvin Griffin Road, Augusta, Georgia 30906. Any allegations set forth within said Paragraph 5 of Plaintiff's Complaint that have not been expressly admitted or denied above, are hereby denied.

6. Admitted on information and belief.

7. GEORGIA-PACIFIC lacks sufficient knowledge or information to form a belief as to the truth or falsity of the allegations stated in Paragraph 7 of Plaintiff's Complaint and it therefore denies them.

8. GEORGIA-PACIFIC denies the allegations set forth within Paragraph 8 of Plaintiff's Complaint to the extent that it alleges that GEORGIA-PACIFIC negligently loaded boxes onto the back of the truck. As to the remaining allegations stated within Paragraph 8 of Plaintiff's Complaint, GEORGIA-PACIFIC lacks sufficient knowledge or information to form a belief as to the truth or falsity of said allegations and it therefore denies them.

9. Denied.

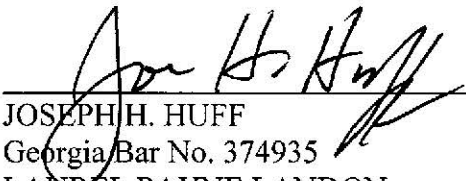
Any and all remaining allegations of Plaintiff's Complaint not specifically admitted nor denied herein, to include any allegations stated within Plaintiff's prayer for relief, are hereby expressly denied.

Having fully answered Plaintiff's Complaint, GEORGIA-PACIFIC requests that this case be dismissed, that judgment be entered in favor of GEORGIA-PACIFIC against Plaintiff, that all costs of this action be taxed against Plaintiff, and that the Court provide such further relief as it deems just and proper.

JURY DEMAND

If this case is not dismissed or otherwise subject to summary adjudication, then GEORGIA-PACIFIC hereby requests and demands a jury trial.

Respectfully submitted this 24th day of August, 2018



JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202

Attorneys for GEORGIA-PACIFIC LLC

CERTIFICATE OF SERVICE

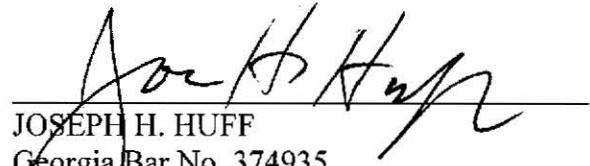
This is to certify that a copy of the within and foregoing *Answer and Affirmative Defenses to Complaint*, has been served upon counsel for the parties identified below by placing a copy of same in the United States Mail in an envelope with adequate postage affixed and addressed to:

David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

Dennis B. Keene, Esquire
John D. Harvey, Esquire
BOUHAN FALLIGANT LLP
One West Park Avenue
Savannah, GA 31401-2139

This th 24 day of August, 2018.

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202


JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Attorney for First Defendant

Record ID 82952

SHERIFF'S ENTRY OF SERVICECivil Action No. 2018RCSC00850Date Filed 06/20/18 04:00 PMAttorney's Address David Bell
David B. Bell, P.C.
619 Greene Street
Augusta, Georgia 30901

Name and Address of Party to be Served.

Georgia-Pacific, LLC through its agent for serviceCT Corporation System 289 S. Culver StreetLawrenceville, Georgia 30046Superior Court ☐
State Court ☒
Juvenile Court ☐Magistrate Court ☐
Probate Court ☐Georgia, RICHMOND COUNTY

Taylor, Rhonda

Plaintiff

VS.

Georgia-Pacific, LLC through its agent for service; Swing

Transport, Inc.; Doe, John

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☒ Served the defendant GA Pacific LLC a corporation
☒ by leaving a copy of the within action and summons with Linda Banks in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant not to be found in the jurisdiction of this court.This 26 day of July, 20 18

Deputy

General Civil and Domestic Relations Case Filing Information Form☐ Superior or ☒ State Court of Richmond County**For Clerk Use Only**Date Filed 06-20-2018
MM-DD-YYYYCase Number 2018RCSC850**Plaintiff(s)**

Taylor, Rhonda

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Bell, Mr. David B.**Defendant(s)**

Georgia-Pacific, LLC through its agent, for

Last First Middle I. Suffix Prefix

Swing Transport, Inc.

Last First Middle I. Suffix Prefix

Doe, John

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 047750 Self-Represented ☐**Check One Case Type in One Box****General Civil Cases**

- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☒ Automobile Tort
- ☐ General Tort
- ☐ Contract
- ☐ Real Property
- ☐ Civil Appeal
- ☐ Habeas Corpus
- ☐ Restraining Petition
- ☐ Injunction/Mandamus/Other Writ
- ☐ Garnishment
- ☐ Landlord/Tenant
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Dissolution/Divorce/Separate Maintenance
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Adoption
- ☐ Family Violence Petition
- ☐ Other Domestic Relations

Post-Judgement – Check One Case Type

- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony.
- ☐ Modification
- ☐ Administrative/Other

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. §9-11-7.1.

- ☐ Is interpreter needed in this case? If so, provide the language(s) required. Language(s) Needed

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

IN THE STATE COURT OF RICHMOND COUNTY, GEORGIA

CIVIL ACTION FILE NO. 2018RCSC00850

Rhonda Taylor)
PLAINTIFF,)
)
)
VS.)
Georgia-Pacific, LLC 1st Defen.)
Swing Transport Inc. 2nd Def.)
DEFENDANT.)
John Doe, Third Def.

CLERK OF SUPERIOR COURT
RICHMOND COUNTY, GA.
10/18/22 11:12:58

AMENDED STANDING ORDER FOR MEDIATION IN CIVIL CASES

In accordance with the mandate of the Georgia Constitution of 1983 that the judicial branch of government provide "speedy, efficient and inexpensive resolution of disputes and prosecutions," and pursuant to the Georgia Supreme Court's Alternative Dispute Resolution Rules encouraging the use of alternative dispute resolution by the courts of this state, this **Amended Standing Order for Mediation in Civil Cases** is hereby entered. As set forth herein, all contested civil matters filed in the State Court of Richmond County, **unless exempted** as set forth below, must be mediated in accordance with this Order.

MEDIATION REQUIRED.

Mediation is a prerequisite to placement of a case on a trial calendar and should occur after all responsive pleadings have been filed and discovery has been completed. Mediation shall be conducted in accordance with this Order and the rules of the Augusta Judicial Circuit (AJC) Alternative Dispute Resolution (ADR) Program.

The parties shall agree upon a mediator from the AJC roster of mediators registered by the Georgia Office of Dispute Resolution (<http://godr.org/>) who have been chosen for service in the

AJC ADR Program. A copy of the roster is available at the AJC ADR Program website at www.augustaga.gov/1438/ADR. Should the parties fail to agree upon a mediator, the Court or the ADR Director will appoint one for them and may set the fee. Should the parties desire to use a mediator not on the AJC ADR Program roster, they may **petition the Court** to utilize any mediator **provided he/she is registered with the Georgia Office of Dispute Resolution in the appropriate category.** If approved, prior to mediation, Plaintiff shall notify the ADR Director in writing of the name of the mediator and the time and location of the mediation, and the mediator will be paid in accordance with the agreement with the mediator.

Parties shall contact the mediator directly and schedule the mediation. The plaintiff's counsel shall provide the date of the mediation and the name of the mediator selected on the Notice of Mediation Status (Attachment A hereto) by email or U.S. Mail to the ADR Director **prior to the scheduled session.** Unless otherwise agreed, the parties shall share the cost of the mediator equally and should be prepared to pay the mediator at the conclusion of the session. Any party unable to afford the cost of mediation may submit a Request for Fee Waiver or Fee Reduction, available on the AJC ADR website, to the AJC ADR office.

The parties and their counsel shall negotiate in *good faith* to resolve all issues in the case with the mediator. Within *seven* calendar days after mediation the parties shall notify the ADR Director whether mediation was successful by completing and submitting to the ADR Director a copy of the Attestation Form (Attachment B hereto). In the absence of settlement, the parties lose none of their rights to a final hearing or trial.

Compliance with this Order does not require the parties to reach a settlement. The mediator has no authority to compel settlement. Any settlement is entirely voluntary.

APPEARANCE.

The presence of parties at all mediation conferences is required unless the court excuses attendance for good cause shown. The requirement that a party appear at a mediation conference is satisfied if the following persons are physically present:

(a) The party and/or:

(1) The party's representative who has:

(i) Full authority to settle without further consultation; and

(ii) A full understanding of the dispute and full knowledge of the facts;

(2) A representative of an insurance carrier for any insured party if that representative has full authority to settle without further consultation, except that telephone consultations with persons immediately available are permitted. Appearance of an insurance carrier's representative by telephone is permitted only if all parties agree.

DISCRETIONARY EXEMPTIONS.

Any party may petition the court to exempt the case from mediation by filing a Mediation Exemption Petition, a copy of which shall also be provided to the ADR Director. An exemption from mediation may be requested for the following reasons:

(1) The issue(s) to be considered has been previously mediated by a mediator registered with the Georgia Office of Dispute Resolution;

(2) The issue(s) presents a question of law only;

(3) Good cause shown before the judge to whom the case is assigned.

Any exemption shall be within the discretion of the court.

MANDATORY EXEMPTIONS.

The following shall be exempt from mediation except upon petition of all parties or upon *sua sponte* motion of the Court:

- (a) Appeals from rulings of administrative agencies;
- (b) Forfeitures of seized properties;
- (c) Bond validations; and
- (d) Declaratory relief.

CONFIDENTIALITY AND PRIVILEGE.

The Georgia Supreme Court Alternative Dispute Resolution Rules and the Augusta Judicial Circuit Alternative Dispute Resolution Rules provide protections, immunities, and benefits to parties, counsel, and registered neutrals in properly conducted court-connected mediations. All submissions provided to a registered mediator, discussions, representations, and statements made in connection with a court-connected mediation proceeding shall remain confidential and privileged consistent with Georgia law. Parties and neutrals acting in a court-annexed or court-referred ADR process are entitled to these confidentiality and immunity protections. (Supreme Court ADR Rule 6.1 and 6.2.) Non-registered mediators do not have the confidentiality or immunity protections provided by the Supreme Court of Georgia.

ATTESTATION OF MEDIATION PARTICIPATION OR EXEMPTION.

Prior to requesting a pretrial conference or trial date, the requesting party is directed to submit a file stamped copy of the Attestation Form filed with the Clerk of Court to the ADR Director. Failure to attest will result in continuance of the matter until compliance is demonstrated.

EFFECTIVE DATE OF ORDER

This Order shall become effective January 25, 2018, and shall apply to all civil cases, including existing cases, except those exempted as described above.

SO ORDERED this 22 day of June, 2018.

PATRICIA W. BOOKER

Judge
State Court of Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY, GEORGIA

CIVIL ACTION FILE NO. _____

_____,)
PLAINTIFF,)
VS.)
_____,)
DEFENDANT.)

NOTICE OF MEDIATION STATUS
(Attachment A)

- ☐ I do hereby confirm that the parties in the above-styled action have selected and agreed to the following registered mediator:

Mediator's Name: _____

Date of Mediation: _____

- ☐ Parties request a mediator be assigned by the AJC ADR Program.
☐ Case Dismissed/Case Settled prior to mediation.
☐ Mediation exemption granted. (See copy attached.)

This _____ day of _____, 20____.

Plaintiff's Counsel

Printed Name: _____

IN THE STATE COURT OF RICHMOND COUNTY, GEORGIA

CIVIL ACTION FILE NO. _____

_____,)
PLAINTIFF,)
VS.)
_____,)
DEFENDANT.)

ATTESTATION FORM
(Attachment B)

I do hereby attest that the parties in the above-styled action have:

☐ **Attended Mediation:**

Date: _____

Mediator's Name: _____

Outcome: _____

☐ Case Dismissed/Case Settled prior to mediation.

☐ **Granted an Exemption** (See copy attached.)

This _____ day of _____, 20____.

Requesting Party's Signature

Printed Name: _____

Sworn to and subscribed before me,
this _____ day of _____, 20____.

Notary Public
My Commission Expires: _____

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,
PLAINTIFF,
VS.
GEORGIA-PACIFIC, LLC
FIRST DEFENDANT,
SWING TRANSPORT, INC.
SECOND DEFENDANT,
JOHN DOE,
THIRD DEFENDANT,

CIVIL ACTION FILE

2018 RCSC 850

HATTIE HOLMES SULLIVAN
CLERK, RICHMOND CO., GA.


18 JUL 16 PM 3:04

CLERK OF SUPERIOR, STATE
AND JUVENILE COURT
FILED FOR: 11-11-18

ACKNOWLEDGMENT OF SERVICE

COMES NOW, John D. Harvey, as attorney for the Defendant, Swing Transport, Inc.,
and hereby acknowledges service on Swing Transport, Inc., in lieu of actual service by the
Sheriff, a copy of the Summons and Complaint has been received and copy of summons waived;
and all other and further service and notice is waived.

This 12/14 day of July, 2018.


JOHN D. HARVEY
GEORGIA STATE BAR NO. 335502
Attorney for Second Defendant

OF COUNSEL:

BOUHAN FALLIGANT, LLP
ONE WEST PARK AVENUE
SAVANNAH, GEORGIA 31401
(912) 232-7000

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Green Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant

John D. Harvey
Bouhan Falligant, LLP
One West Park Avenue
Savannah, Georgia 31401
Attorney for Second Defendant

This 13th day of July, 2018.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

IN THE STATE COURT OF RICHMOND COUNTY

FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE 2018RCSC00850
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

ORDER

Plaintiff having moved the Court to add Georgia-Pacific Corrugated, LLC as an additional Party Plaintiff, and the Defendant having consented to said Motion.

It is hereby ORDERED, DECREED and ADJUDGED that Georgia-Pacific, LLC shall be added as an additional Party/Plaintiff in and for the captioned case. Furthermore, the caption shall be amended to reflect this addition and the Plaintiff shall redraft his Complaint accordingly.

SO ORDERED, this 16th day of November, 2018.


Patricia W. Booker
HONORABLE PATRICIA BOOKER
JUDGE

PRESENTED BY:




DAVID B. BELL
ATTORNEY FOR PLAINTIFF

I DO NOT OBJECT:



JOSEPH H. HUFF
ATTORNEY FOR GEORGIA-PACIFIC

I DO NOT OBJECT:



JOHN D. HARVEY
ATTORNEY FOR SWING TRANSPORTATION

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Green Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant

John D. Harvey
Bouhan Falligant, LLP
One West Park Avenue
Savannah, Georgia 31401
Attorney for Second Defendant



This 30th day of Nov, 2018.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
AUG 08, 2018 12:45 PM

Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

**IN THE STATE COURT OF RICHMOND COUNTY
STATE OF GEORGIA**

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

ANSWER OF DEFENDANT SWING TRANSPORT, INC.

COMES NOW, Defendant, Swing Transport, Inc., ("Defendant") and files this Answer to Plaintiff's Complaint and respectfully shows as follows:

FIRST DEFENSE

Plaintiff's Complaint fails to state a claim against Defendant upon which relief may be granted.

SECOND DEFENSE

The actions of Plaintiff proximately caused any damages suffered by Plaintiff.

THIRD DEFENSE

Plaintiff failed to exercise reasonable care for his own safety, thus Plaintiff is precluded from recovering from Defendant.

FOURTH DEFENSE

Defendant responds to the consecutively numbered paragraphs of the Complaint as follows:

1. Defendant is without sufficient information to admit or deny the allegations contained in paragraph 1 of the Complaint and, thus, denies the same.

2. Defendant admits the allegations contained in paragraph 2 of Plaintiff's Complaint.

3. Defendant is without sufficient information to admit or deny the allegations contained in paragraph 3 of the Complaint, thus, denies the same.

4. Defendant denies the allegations of paragraph 4 of Plaintiff's Complaint.

5. Defendant admits the allegations of paragraph 5 of Plaintiff's Complaint.

6. Defendant admits the allegations of paragraph 6 of Plaintiff's Complaint.

7. Defendant is without sufficient information to admit or deny the allegations contained in paragraph 7 of the Complaint and, thus, denies the same.

8. Defendant denies the allegations of paragraph 8 of Plaintiff's Complaint.

9. Defendant denies the allegations of paragraph 9 of Plaintiff's Complaint.

10. To the extent Plaintiff's Prayer for Relief requires a response, the same is denied.

11. Each and every allegation not expressly admitted is deemed denied.

WHEREFORE, having fully answered and responded to the Plaintiff's Complaint, Defendant respectfully requests the following:

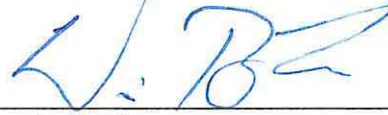
(a) That Plaintiff have and recover nothing from this Defendant;

(b) For a trial by jury;

- (b) That judgment be entered in favor of this Defendant;
- (c) That the Complaint against this Defendant be dismissed with prejudice;
- (d) That all costs of defending against the Complaint be taxed against Plaintiffs; and
- (e) That Defendant have such other relief as this Court deems just and proper.

Respectfully submitted this 8th day of August, 2018.

BOUHAN FALLIGANT, LLP



Dennis B. Keene

Georgia Bar No.: 410801

John D. Harvey

Georgia Bar No.: 335502

Attorneys for Defendant Swing Transport, Inc.

One West Park Avenue
Savannah, Georgia 31401
Phone: (912) 232-7000
Fax: (912) 233-0811
dkeene@bouhan.com,
jdharvey@bouhan.com

**IN THE STATE COURT OF RICHMOND COUNTY
STATE OF GEORGIA**

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the forgoing Answer of Defendant Swing Transport, Inc. on the following counsel of record via U.S. Mail:

David B. Bell
P.O. Box 1011
Augusta, GA 30903-1011

Attorney for Plaintiff

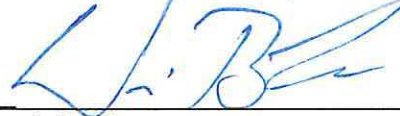
Joseph H. Huff
Laurel Payne Landon
Kilpatrick Townsend & Stockton, LLP
Enterprise Mill
1450 Green Street, Suite 230
Augusta, GA 30901

*Attorneys for Defendant Georgia- Pacific,
LLC*

[Signature on Following Page]

Respectfully submitted this 8th day of August, 2018.

BOUHAN FALLIGANT, LLP



Dennis B. Keene

Georgia Bar No.: 410801

John D. Harvey

Georgia Bar No.: 335502

Attorneys for Defendant Swing Transport, Inc.

One West Park Avenue
Savannah, Georgia 31402
Phone: (912) 232-7000
Fax: (912) 233-0811
dkeene@bouhan.com
jdharvey@bouhan.com

Taylor v. Swing Transport, Inc., et al.
State Court of Richmond County
Civil Action No. 2018RCSC00850
Signature Page to Swing Transport's Certificate of Service to the Answer

IN THE STATE COURT OF RICHMOND COUNTY

FOR THE STATE OF GEORGIA

CLERK OF SUPERIOR, JUVENILE
AND DISTRICT COURTS
FILED FOR RECORD
18 JUL 16 PM 2:25
NAT'L. OFFICE OF CLERK
CLERK, RICHMOND CO., GA.

RHONDA TAYLOR,

PLAINTIFF,

VS.

GEORGIA-PACIFIC, LLC

FIRST DEFENDANT,

SWING TRANSPORT, INC.

SECOND DEFENDANT,

JOHN DOE,

THIRD DEFENDANT,

CIVIL ACTION FILE

00

ACKNOWLEDGMENT OF SERVICE

COMES NOW, John D. Harvey, as attorney for the Defendant, Swing Transport, Inc.,
and hereby acknowledges service on Swing Transport, Inc., in lieu of actual service by the

Sheriff; a copy of the Summons and Complaint has been received and copy of summons waived;

and all other and further service and notice is waived.

This 12/16 day of July, 2018.

*of the summons and compl. ht
is waived.
JH*

JOHN D. HARVEY
GEORGIA STATE BAR NO. 335502
Attorney for Second Defendant

OF COUNSEL:

BOUHAN FALLIGANT, LLP
ONE WEST PARK AVENUE
SAVANNAH, GEORGIA 31401
(912) 232-7000

FILED IN OFFICE
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
SEP 17, 2018 02:02 PM


Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION FILE NO.
)	2018-RCSC-00850
GEORGIA-PACIFIC, LLC,)	
)	
First Defendant,)	
)	
SWING TRANSPORT, INC.,)	
)	
Second Defendant,)	
)	
JOHN DOE,)	
)	
Third Defendant.)	
_____)	

RULE 5.2 CERTIFICATE OF SERVICE

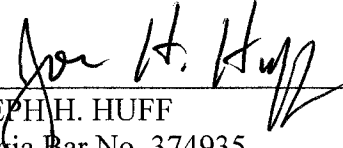
I HEREBY CERTIFY THAT I have this day served copies of *First Defendant's Responses to Plaintiff's First Interrogatories and Request for Production of Documents* and *First Interrogatories and Requests for Production of Documents to Plaintiff Rhonda Taylor from First Defendant Georgia-Pacific LLC*, upon opposing counsel by placing same in the U.S. mail with adequate postage affixed and addressed to:

David B. Bell, Esquire
Post Office Box 1011
Augusta, GA 30903-1011

Dennis B. Keene, Esquire
John D. Harvey, Esquire
BOUHAN FALLIGANT LLP
One West Park Avenue
Savannah, GA 31401-2139

This 10th day of September, 2018.

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202



JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Attorneys for First Defendant

CERTIFICATE OF SERVICE


This is to certify that I have this day served a copy of the within and foregoing **Rule 5.2 Certificate of Service** upon opposing counsel by placing a copy of same in the U.S. mail with adequate postage affixed and addressed to:

David B. Bell, Esquire
Post Office Box 1011
Augusta, GA 30903-1011

Dennis B. Keene, Esquire
John D. Harvey, Esquire
BOUHAN FALLIGANT LLP
One West Park Avenue
Savannah, GA 31401-2139

This 10th day of September, 2018.

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202



JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Attorneys for First Defendant

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CLERK OF SUPERIOR COURT
AND COUNTY CLERK
18 JUL 22 PM 12:57
CLERK, RICHMOND CO., GA.

**FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO FIRST DEFENDANT**

TO: FIRST DEFENDANT, GEORGIA-PACIFIC, LLC AND ITS ATTORNEY OF
RECORD

In accordance with the applicable rules and statutes governing practice and procedure relating to discovery, you are required to answer separately and fully in writing, under oath and within the time required by law, the Interrogatories attached hereto as Exhibit "A". These Interrogatories shall be deemed continuing so as to require supplemental answers if further information is obtained between the time answers are served and the time of trial.

As used herein, the term "you" shall refer to the Defendant, his agents, employees, officers, investigators and attorneys. In the event any information requested is privileged, Defendant is requested to state the grounds for such privilege.

As used herein, the term "identify" when used in reference to a person means that the Defendant is required to state the name, and last known address. When used with reference to a document, Defendant shall describe said document and state the person or persons who have custody thereof including the last known address and telephone number of such person or persons.

Further, as used herein, the term "document" shall refer to any written memorandum, letter report, statement, photograph, drawing, map, contract, or other written instrument or a copy of any of the foregoing in the event the copy is different from the original, plus any tape recording or other means of electronic or photographic reproduction.

This 21st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
Attorney for Plaintiff

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

EXHIBIT "A"

1. State your complete legal name for the past five (5) years.
2. Identify all persons known to you who have or claim to have knowledge of facts relevant to the issues formed by the pleadings in this action, and the incident referenced therein, including but not limited to the persons who loaded the truck in South Carolina and the person who drove the truck from South Carolina to Augusta, Georgia.
3. Identify any expert witness(es) whom you expect to call at the trial of this case.
4. With respect to each such expert, please provide the following:
 - (a) The subject matter of which the expert is expected to testify;
 - (b) The substance of the facts and opinions to which the expert is expected to testify;
 - (c) A summary of the grounds for each opinion.
5. Do you contend that the negligence of any person, firm, corporation or other entity caused or contributed to the damages sought to be recovered by the plaintiff herein? If so, please identify each such person, firm, corporation or other entity and describe in detail the negligence and the manner in which such negligence contributed to the said damages. In this regard, please state every fact upon which you base your defense that plaintiff failed to exercise ordinary care for his own safety, failed to avoid the consequences of Defendant's alleged negligence, and was guilty of negligence which

was either the sole proximate cause of his injuries or was at least equal to if not greater than any negligence alleged against the Defendant.

6. Do you claim that there exists any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of any judgment which may be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment? If so, please state the name of the insurance business, provide the policy number, the policy limits and state whether or not such insurance business is providing you with a defense in this claim; and, if so, also please state whether there has been a reservation of rights made by the insurer.

7. Identify any person who has in any manner participated in any investigation pertaining to any issue arising out of the incident involved in this case. For each person identified in response to this interrogatory, state the substance of any facts or information acquired as a result of such person's participation in any such investigation.

8. Please state the name, addresses, telephone numbers and places of employment of all persons known to you, either from your investigation or from any investigation made on your behalf who have knowledge of the issues involved in this case.

9. Are you aware of the existence of any written, recorded or transcribed statements made by anyone concerning this action or the subject matter of this action? If so, please identify each such statement, the date taken, by whom taken and the names and addresses of all persons presently having copies of same.

10. List and describe in specific detail each and every document, piece of correspondence, report or other writing which contains information which concerns the subject matter of this action.

11. Identify any photographs, charts, diagrams, plats, drawings, moving pictures, videotapes, models or other depictions (whether prepared by you or not) which depict any scene, object or person which is or may be relevant to any matter involved in this case.

12. State in detail and in narrative form your version of the facts of the incident which is alleged in Plaintiff's complaint, giving specific details and proper sequence of events, including every factual contention upon which you base any defense as set out in your answer to said complaint.

13. Identify all eyewitnesses to the incident which gave rise to this lawsuit.

14. State whether Plaintiff, or any agent of Plaintiff, has made any statements in any form regarding any phase of the incident referred to in the captioned suit or the injuries resulting therefrom and give the name and address of the person or persons to whom each such statement was made, the date and form of each such statement, and the name and address of the person(s) presently having possession, custody, or control of each such statement.

15. If Defendant or any representative of Defendant obtained statements from any person who has or claims to have knowledge of any relevant facts concerning any of the issues involved in the captioned suit, state whether such statement was oral, written,

or recorded, and give the name and address of the person who gave the statement, the date and place the statement was made, the name and address of each person present when the statement was made, and the name and address of each person who has present custody of each written statement, recording of an oral statement or a transcript of a reported or recorded statement.

16. State whether you or anyone on your behalf prepared a report of the incident complained of. State whether you or anyone on your behalf filed a report of this incident with any party whomsoever, and give the name and address of the person with whom such report was filed and/or the name and address of the person who has custody of such report.

**EXHIBIT "B": PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT**

Pursuant to the provisions of Official Code of Georgia Annotated Section 9-11-34, you are hereby requested to produce the documents described below, by mailing a copy of all such described documents to the undersigned attorney, David B. Bell, P. O. Box 1011, Augusta, Georgia, 30903-1011, within thirty (30) days following your receipt of this request.

1. Original or true copies of all policies of insurance identified in your response to Interrogatory No. 4 of Plaintiff's First Interrogatories which do or may provide any coverage as to any of the injuries or damages claimed in this action. This request directs itself to the entire policy.

2. All surveillance or investigatory material which depicts or attempts to depict or is claimed to depict any issue raised in this action.

3. All written, recorded or transcribed statements of any witness (including any expert witness) or other person (including Plaintiff or any agent of Plaintiff) concerning the subject matter of this action as identified in your responses to Interrogatories 7, 12, and 13 of Plaintiff's First Interrogatories.

4. All documents, correspondence, reports or other writings concerning the subject matter of this action identified in your response to Interrogatory No. 8 of Plaintiff's First Interrogatories.

5. All depictions of any scene, object or person which is or may be relevant to any subject matter of this action as identified in your response to Interrogatory No. 9 of Plaintiff's First Interrogatories.

6. All reports of this incident identified in your response to Interrogatory No. 14 of Plaintiff's First Interrogatories.

7. Any report identified in your answers to these Interrogatories.

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CLERK OF SUPERIOR COURT
JUN 22 10 12:56
CLERK OF SUPERIOR COURT
JUN 22 10 12:56

**FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO THIRD DEFENDANT**

TO: THIRD DEFENDANT, JOHN DOE, AND HIS/HER ATTORNEY AT LAW

In accordance with the applicable rules and statutes governing practice and procedure relating to discovery, you are required to answer separately and fully in writing, under oath and within the time required by law, the Interrogatories attached hereto as Exhibit "A". These Interrogatories shall be deemed continuing so as to require supplemental answers if further information is obtained between the time answers are served and the time of trial.

As used herein, the term "you" shall refer to the Defendant, his agents, employees, officers, investigators and attorneys. In the event any information requested is privileged, Defendant is requested to state the grounds for such privilege.

As used herein, the term "identify" when used in reference to a person means that the Defendant is required to state the name, and last known address. When used with reference to a document, Defendant shall describe said document and state the person or persons who have custody thereof including the last known address and telephone number of such person or persons.

Further, as used herein, the term "document" shall refer to any written memorandum, letter report, statement, photograph, drawing, map, contract, or other written instrument or a copy of any of the foregoing in the event the copy is different from the original, plus any tape recording or other means of electronic or photographic reproduction.

This 21st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
Attorney for Plaintiff

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

EXHIBIT "A"

1. Please state the name, present address and position or job title of the individual or individuals (a) answering these interrogatories on behalf of Defendant and the name, present address and position or job title of all individuals who were consulted or assisted in answering these Interrogatories on behalf of Defendant, and (b) responding to Plaintiff's request for production of documents on behalf of Defendant and the name, present address and position or job title of all individuals who were consulted or assisted in answering those requests or production of documents on behalf of Defendant.
2. Please identify any insurance company which may be liable to satisfy all or a part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy a judgment, state the policy number for each such policy and the limits of liability coverage for each policy of insurance which may be applicable to pay part or all of a judgment rendered versus the Defendant.
3. Please give the name, addresses and telephone numbers of all persons that have relevant knowledge, or information reasonably calculated to lead to the discovery of relevant or admissible evidence, concerning the facts and circumstances surrounding the injuries and damages sustained by Plaintiff in the incident described in the complaint.
4. Describe with particularity all photographs, charts, diagrams, videotapes, documents, illustrations, and/or other tangible items, of any person, place or thing involved in this lawsuit, giving the date each was made and the name and address of the person(s) with possession, custody or control of each item.

5. Please list each act of negligence, contributory negligence, or comparative negligence you contend Plaintiff, or any other person or entity, did or failed to do, which in any way contributed to the subject occurrence and Plaintiff's injuries.
6. Please detail the factual and legal basis for each defense pled in your Answer, including all United States statutes, city ordinances, county ordinances, case law and all other governmental laws, rules or regulations which you contend Plaintiff, or any other person or entity violated with respect to the incident giving rise to this lawsuit.
7. Please state the name and address of all expert witnesses or professional consultants retained or consulted by you or on your behalf to make an evaluation or investigation of the cause of the occurrence giving rise to this lawsuit or the damages sustained by Plaintiffs.
8. Please identify each expert expected to testify at trial and state the subject matter the expert is expected to testify about, the substance of the facts and opinions to which the expert is expected to testify, and give a summary of the grounds for each opinion. See O.C.G.A. § 9-11-26(b)(4)(A)(i). Please note that this interrogatory applies to all expert witnesses including all practitioners of the healing arts.
9. Do you or anyone acting on your behalf have or know of any witness statements, reports, memos, field notes, photographs, maps, drawings, diagrams, measurements, surveys, schematics, or other descriptions or any other documents or physical evidence concerning the incidents set forth in the Complaint? If so, to each such item, identify:
 - a) The nature of the document or physical evidence;
 - b) The specific subject matter of the document;

- c) The date the document was made known or taken;
 - d) The name and last known address of the person making or taking it; and
 - e) The present custodian of each document or item of physical evidence.
10. Identify each person who has investigated this incident on your behalf and state the beginning and ending date of each such person's investigation.
11. Please state when you were first notified of the incident which forms the basis of this lawsuit. Please include the following in your answer:
- a) The method by which such notice was received;
 - b) The identity of all persons who received such notice;
 - c) Whether a written report was made of such notice;
 - d) The present location and custodian of any written report which was made of such notice; and
 - e) What you did in response to receiving such notice.
12. State your complete legal name and residence addresses for the past five (5) years.
13. What is the date of your birth and your social security number?
14. If you are married at the present, please give the complete legal name of your spouse.
15. Please identify all of your employers for the past ten (10) years, giving dates of employment and a brief description of your duties.
16. Have you ever filed bankruptcy? If so, identify the date; court and case number of the bankruptcy petition.
17. If any of the persons listed in the answer to any of the preceding interrogatories are related to you or to each other, or employed by you, please state the nature of such relationship.

18. Pursuant to Section 34 of the Civil Practice Act, attach to your response to these Interrogatories a copy of any such picture, photograph, drawing, recording, tangible object or other document referred to in response to Interrogatory Numbers 4 and 9, or, in the alternative, state where and when counsel may inspect and/or copy same within the time provided by law.

19. Pursuant to Section 34 of the Civil Practice Act, please attach to your response to these Interrogatories a copy of any such statement listed in response to the above Interrogatories, or, in the alternative, state when and where counsel may inspect, listen to and/or copy each statement within the time provided by law.

20. Prior or subsequent to this litigation, were you ever a plaintiff or defendant in any other legal action of any kind, civil or criminal? If so, state the following:

- a) the style of the case, including the court in which the action was brought;
- b) The substance of the allegations made by or against you;
- c) The year in which the action was filed; and
- d) The outcome of each such lawsuit.

21. Have you ever pled guilty to or been convicted of any crime? If so, please state:

- a) The date of the plea or conviction;
- b) The nature of the crime; and
- c) Court where plea was entered or conviction rendered.

22. State in detail the manner in which you contend the occurrence referred to in the Complaint took place.

23. Do you know of anyone who claims to have seen or heard the Plaintiff or Defendant make any statement against his or her interest regarding the occurrence referred to in the Complaint, and, if so, please identify each such person.

24. Please list the names, residences, employment and spouse of your relatives who reside in the county you reside. ("Relative" means parents, grandparents, brothers, sisters, children, aunts, uncles and first cousins.)

25. On the day of the wreck that forms the basis for this action:

- (a) What was your cell phone number;
- (b) Which service provided your cell phone;
- (c) Under what name was your cell phone registered?

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CLERK OF SUPERIOR COURT
RICHMOND COUNTY, GA.
18 JAN 22 PM 1:09

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT

TO: Third Defendant, John Doe, and his attorney of record.

Comes Now Plaintiff, by and through counsel, and in accordance with O.C.G.A. § 9-11-34, requests Defendant to produce to the Plaintiff at the offices of David B. Bell, 619 Greene St., Augusta, GA 30901 Greene St., Augusta, GA 30901, on the forty-fifth (45th) day following service of this Complaint, or at any such other reasonable time or place as might be mutually agreed upon by the parties and their attorneys prior to said date, for the purpose of inspection and copying the matters described in the numbered paragraphs below.

Plaintiff has need to examine, copy and inspect said described items and is unable, without due hardship, to obtain the substantial equivalent of the materials by other means, or alternatively Plaintiff is otherwise entitled to said items under O.C.G.A. § 9-11-34.

Defendant is requested to file a response to this Request on or before the date set forth above in accordance with O.C.G.A. § 9-11-34. It is hereby certified that a true and correct copy of this foregoing notice of Request to Produce has been served upon this party by being attached to the Summons and Complaint.

As used herein, the term "identify" when used in reference to a person means that the Defendant is required to state the name, and last known address. When used with reference to a document, Defendant shall describe said document and state the person or persons who have custody thereof including the last known address and telephone number of such person or persons.

Further, as used herein, the term "document" shall refer to any written memorandum, letter report, statement, photograph, drawing, map, contract, or other written instrument or a copy of any of the foregoing in the event the copy is different from the original, plus any tape recording or other means of electronic or photographic reproduction.

This 71st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
Attorney for Plaintiff


OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

REQUEST FOR PRODUCTION

1. All documents evidencing, reflecting, relating to, or constituting any communication between Defendants and Plaintiff or any third person or entity relating to the incident of matters involved in this lawsuit, including without limitation all correspondence, letters, notes, tapes, memoranda, and any other evidence of communications that in any way relates to this incident.
2. The original or a certified true and accurate copy of the declaration sheet or coverage page and all applicable insurance policies that may provide coverage or benefits to the Defendants in connection with this occurrence. (This request seeks each and every policy that may provide coverage in any amount.)
3. Copies of any and all transcripts from any investigation, hearing, or any judicial or quasi-judicial hearing or investigation relating to the incident giving rise to this Complaint.
4. Copies of the entire file, bills, all reports, memoranda or notes from any expert who has investigated any aspect or element of the subject incident or who you intend to call as a witness.
5. Any and all documentary evidence or other tangible evidence which relates to or is reasonably calculated to lead to the discovery of relevant or admissible evidence regarding any of the Plaintiff's claims in this action or Defendant's defenses.
6. Please produce any and all documents which reflect any of the information provided in response to the Interrogatories propounded herewith.

7. Produce the Defendant's cell phone bill for the month of the wreck. If the Defendant does not have possession of the cell phone bill for the month of the wreck, then produce the most recent/current cell phone bill.

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
OCT 11, 2018 03:40 PM


Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY		
FOR THE STATE OF GEORGIA		
RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION FILE NO.
)	2018RCSC00850
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT.)	

CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO
UNIFORM STATE COURT RULE 5.2

I, the undersigned counsel for Defendant Swing Transport, Inc., certify that on this day I caused to have mailed a copy of Defendant Swing Transport, Inc.'s First Request For Admissions to Defendant Georgia-Pacific LLC., upon the following counsel of record, via United States mail, with proper postage affixed thereon and addressed to:

DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

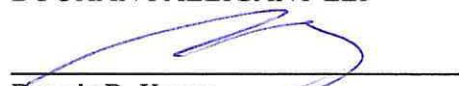
KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

[Signature on Following Page]

This 11/16 day of October, 2018.

BOUHAN FALLIGANT LLP

One West Park Avenue
Savannah, GA 31401-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com


Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Defendant Swing Transport, Inc.

Taylor v. Swing Transport, et al.
State Court of Richmond County
Civil Action No.: 2018RCSC00850
Signature Page to Rule 5.2 Certificate –
Swing Transport's Discovery Request to Defendant

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION FILE NO.
)	2018RCSC00850
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT.)	

CERTIFICATE OF SERVICE

I, the undersigned counsel for Defendant, do hereby certify that I have this day served a copy of **CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO UNIFORM STATE COURT RULE 5.2** upon the following counsel of record via United States Mail with proper postage affixed thereon and addressed as follows:

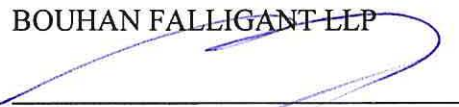
DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011



KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

This 11th day of October, 2018.

BOUHAN FALLIGANT LLP

One West Park Avenue
Savannah, GA 31401-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com


Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
*Attorneys for Defendant
Swing Transport, Inc.*

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
JAN 29, 2019 09:37 AM

Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE: 2018RCSC00850
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CERTIFICATE REGARDING DISCOVERY

Pursuant to Uniform Superior Court Rule 5.2 the undersigned hereby certifies that the following discovery has been served upon all persons identified in the Certificate of Service attached hereto and incorporated herein by reference:

Plaintiff's Deposition of Eddie Cooper.

This 29th day of January, 2019.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Certificate Regarding Discovery has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant



Dennis B. Keene
John D. Harvey
Bouhan Falligan, LLP
P.O. Box 2139
Savannah, Georgia 31402
Attorneys for Second Defendant

This 29th day of January, 2019.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
JAN 18, 2019 10:24 AM

Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	CIVIL ACTION FILE NO.:2018RCSC00850
)	
PLAINTIFF,)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT.)	

CERTIFICATE REGARDING DISCOVERY

Pursuant to Uniform Superior Court Rule 5.2 the undersigned hereby certifies that the following discovery has been served upon all persons identified in the Certificate of Service attached hereto and incorporated herein by reference:

Plaintiff's Notice to Produce to Second Defendant, Swing Transport, Inc. regarding production of documents from Corvel Enterprise Comp, Inc., regarding Rhonda Taylor.

This 18th day of January, 2019.


DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Certificate Regarding Discovery has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant


Dennis B. Keene
John D. Harvey
Bouhan Falligan, LLP
P.O. Box 2139
Savannah, Georgia 31402
Attorneys for Second Defendant

This 18th day of January, 2019.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
JAN 02, 2019 02:32 PM

**IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA**



Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO
UNIFORM STATE COURT RULE 5.2

I, the undersigned counsel for Defendant Swing Transport, Inc., certify that on this day I caused to have mailed a copy of Defendant Swing Transport, Inc.'s First Request for Production of Documents to Non-Party by Certified Mail, Return Receipt Requested, with proper postage affixed and addressed to the following Non-Parties:

CorVel Enterprise Comp, Inc.
c/o Corporation Service Company
40 Technology Pkwy South, #300
Norcross, GA 30092

This is to further certify that I have served the following counsel of record with copies of the aforementioned by placing copies of the same in United States Mail with proper postage affixed thereon and addressed as follows:

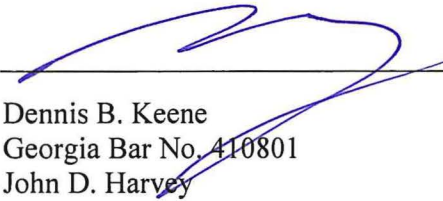
Joseph. H. Huff
Kilpatrick Townsend & Stockton LLP
P.O. Box 2043
Augusta, GA 30903-2043

David. B Bell
David B. Bell PC
PO Box 1011
Augusta, GA 30903-1011

Respectfully submitted this 21 day of January, 2019.

BOUHAN FALLIGANT LLP

Post Office Box 2139
Savannah, GA 31402-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com



Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Swing Transport, Inc.

Rhonda Taylor v. Swing Transport Inc., et al.
State Court of Richmond County
Civil Action File: 2018RCSC00850
Signature Page to 5.2 -Request for
Production of Documents to Non- Party

**IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA**

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CERTIFICATE OF SERVICE

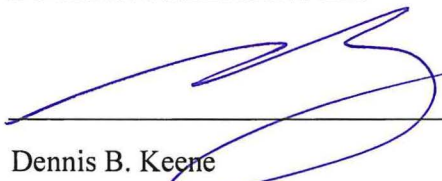
I, the undersigned counsel for Defendant, do hereby certify that I have this day served a copy of **CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO UNIFORM STATE COURT RULE 5.2** upon the following counsel of record via United States Mail with proper postage affixed thereon and addressed as follows:

Joseph. H. Huff
Kilpatrick Townsend & Stockton LLP
P.O. Box 2043
Augusta, GA 30903-2043

David. B Bell
David B. Bell PC
PO Box 1011
Augusta, GA 30903-1011

This 21 day of January, 2019.

BOUHAN FALLIGANT LLP



Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Swing Transport, Inc.

Post Office Box 2139
Savannah, GA 31402-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com

FILED IN OFFICE
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
NOV 14, 2018 10:22 AM

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

Hattie Holmes Sullivan
Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

RHONDA TAYLOR,)	CIVIL ACTION FILE 2018RCSC00850
)	
PLAINTIFF,)	
)	
VS.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	

CERTIFICATE REGARDING DISCOVERY

Pursuant to Uniform Superior Court Rule 5.2 the undersigned hereby certifies that the following discovery has been served upon all persons identified in the Certificate of Service attached hereto and incorporated herein by reference:

Plaintiff's Deposition of Craig Lowe.

This 14th day of Nov, 2018.


DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Certificate Regarding Discovery has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant

Dennis B. Keene
John D. Harvey
Bouhan Falligan, LLP
P.O. Box 2139
Savannah, Georgia 31402
Attorneys for Second Defendant

This 14th day of Nov, 2018.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

FILED IN OFFICE
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
NOV 12, 2018 03:35 PM

Hattie Holmes Sullivan

Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION FILE NO.
)	2018-RCSC-00850
GEORGIA-PACIFIC, LLC,)	
)	
First Defendant,)	
)	
SWING TRANSPORT, INC.,)	
)	
Second Defendant,)	
)	
JOHN DOE,)	
)	
Third Defendant.)	

RULE 5.2 CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I have this day served a copy of *Defendant Georgia-Pacific LLC's Response to Defendant Swing Transport, Inc.'s First Request for Admissions* by depositing a true and correct copy of same in the United States mail in a properly addressed envelope with adequate postage thereon to:

David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

Dennis B. Keene
John D. Harvey
Bouhan Falligant LLP
One West Park Avenue
Savannah, GA 31401-2139

This 12th day of November, 2018.

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202

s/ Joseph H. Huff
JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Attorney for First Defendant

CERTIFICATE OF SERVICE

I have this day served counsel for all interested parties to this action with a copy of ***Rule***

5.2 Certificate of Service via Richmond County PeachCourt File and Serve as follows:

David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

Dennis B. Keene
John D. Harvey
Bouhan Falligant LLP
One West Park Avenue
Savannah, GA 31401-2139

This 12th day of November, 2018.

Kilpatrick Townsend & Stockton LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
(706) 823-4202

s/ Joseph H. Huff
JOSEPH H. HUFF
Georgia Bar No. 374935
LAUREL PAYNE LANDON
Georgia Bar No. 718407

Attorney for First Defendant


Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)
)
PLAINTIFF,)
VS.)
)
GEORGIA-PACIFIC, LLC)
)
FIRST DEFENDANT,)
)
SWING TRANSPORT, INC.)
)
SECOND DEFENDANT,)
)
JOHN DOE,)
)
THIRD DEFENDANT,)

CIVIL ACTION FILE NO.: 2018RCSC00850

CERTIFICATE REGARDING DISCOVERY

Pursuant to Uniform Superior Court Rule 5.2 the undersigned hereby certifies that the following discovery has been served upon all persons identified in the Certificate of Service attached hereto and incorporated herein by reference:

Plaintiff's Notice to Produce to Second Defendant, Swing Transport, Inc. regarding production of documents from Augusta Orthopedic and Sports Medicine Specialists, P.C., Harper, Pennington & Shar, M.D.'s, Doctors Hospital of Augusta, Regina V. Brown Internal Medicine, Gold Cross Ambulance, and Kellogg's Snacks regarding Rhonda Taylor.

This 5th day of November, 2018.



DAVID B. BELL

STATE BAR NO. 047750

ATTORNEY FOR PLAINTIFF

OF COUNSEL:

P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882


CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Certificate Regarding Discovery has been served on opposing counsel by placing a copy of same in the United States mail with appropriate postage affixed thereon and being addressed as follows:

Joseph H. Huff
Kilpatrick Townsend, LLP
Enterprise Mill
1450 Greene Street, Suite 230
Augusta, Georgia 30901
Attorney for First Defendant


Dennis B. Keene
John D. Harvey
Bouhan Falligan, LLP
P.O. Box 2139
Savannah, Georgia 31402
Attorneys for Second Defendant

This 5th day of November, 2018.



DAVID B. BELL
STATE BAR NO. 047750
ATTORNEY FOR PLAINTIFF

OF COUNSEL:
P. O. BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
OCT 22, 2018 03:15 PM

**IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA**

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT,)	


Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

**CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO
UNIFORM STATE COURT RULE 5.2**

I, the undersigned counsel for Defendant Swing Transport, Inc., certify that on this day I caused to have mailed a copy of Defendant Swing Transport, Inc.'s First Request for Production of Documents to Non-Party by Certified Mail, Return Receipt Requested, with proper postage affixed and addressed to the following Non-Parties:

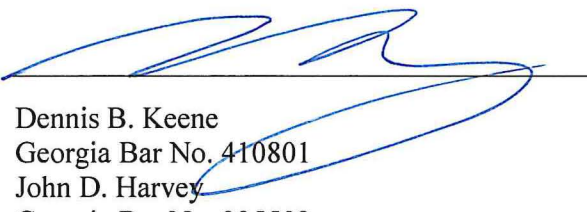
1. Augusta Orthopedic and Sports Medicine Specialists, PC; ATTN: Records Custodian; P.O. Box 14029; Augusta GA, 30919-0039
2. Harper, Pennington & Shah, MD's; ATTN: Records Custodian; 820 St. Sebastian Way, Suite 2A; Augusta, GA 30901
3. Doctor's Hospital of Augusta; ATTN: Records Custodian; 3651 Wheeler Road; Augusta, GA 30901
4. Reginald V. Brown Internal Medicine; ATTN: Records Custodian; 2035 Central Ave.; Augusta, GA 30904
5. Gold Cross Ambulance; ATTN: Records Custodian; P.O. Box 14848; Augusta, GA 30919

6. Kellogg's Snacks; ATTN: Records Custodian; 1550 Marvin Griffin Road;
Augusta, GA 30906

Respectfully submitted this 2nd day of October, 2018.

BOUHAN FALLIGANT LLP

Post Office Box 2139
Savannah, GA 31402-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com



Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Swing Transport, Inc.

Rhonda Taylor v. Swing Transport Inc., et al.
State Court of Richmond County
Civil Action File: 2018RCSC00850
Signature Page to 5.2 -Request for
Production of Documents to Non- Party

**IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA**

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	CIVIL ACTION NO. 2018RCSC00850
vs.)	
)	
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
<u>THIRD DEFENDANT,</u>	<u>)</u>	

CERTIFICATE OF SERVICE

I, the undersigned counsel for Defendant, do hereby certify that I have this day served a copy of **CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO UNIFORM STATE COURT RULE 5.2** upon the following counsel of record via United States Mail with proper postage affixed thereon and addressed as follows:

Joseph. H. Huff
Kilpatrick Townsend & Stockton LLP
P.O. Box 2043
Augusta, GA 30903-2043
Attorney for First Defendant. Georgia-Pacific, LLC

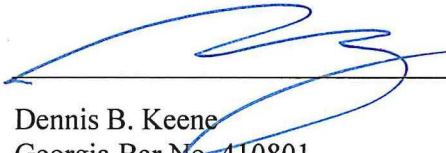
David. B Bell
David B. Bell PC
PO Box 1011
Augusta, GA 30903-1011
Attorney for Plaintiff

[Signature on Following Page]

This 22 day of October, 2018.

BOUHAN FALLIGANT LLP

Post Office Box 2139
Savannah, GA 31402-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com



Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Swing Transport, Inc.

Rhonda Taylor v. Swing Transport Inc., et al.
State Court of Richmond County
Civil Action File: 2018RCSC00850
Signature Page to Cert. of Service to Request
for Production of Documents to Non- Party

 **EFILED IN OFFICE**
CLERK OF STATE COURT
RICHMOND COUNTY, GEORGIA
2018RCSC00850
PATRICIA W. BOOKER
AUG 30, 2018 04:54 PM



Hattie Holmes Sullivan, Clerk
Richmond County, Georgia

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION FILE NO.
)	2018RCSC00850
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT.)	

CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO
UNIFORM STATE COURT RULE 5.2

I, the undersigned counsel for Defendant Swing Transport, Inc., certify that on this day I caused to have mailed a copy of (1) Defendant Swing Transport, Inc.'s First Request For Production of Documents to Plaintiff Rhonda Taylor; and (2) Defendant Swing Transport, Inc.'s First Interrogatories to Plaintiff Rhonda Taylor upon the following counsel of record, via United States mail, with proper postage affixed thereon and addressed to:

DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

[Signature on Following Page]

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION FILE NO.
)	2018RCSC00850
GEORGIA-PACIFIC, LLC)	
)	
FIRST DEFENDANT,)	
)	
SWING TRANSPORT, INC.)	
)	
SECOND DEFENDANT,)	
)	
JOHN DOE,)	
)	
THIRD DEFENDANT.)	

CERTIFICATE OF SERVICE

I, the undersigned counsel for Defendant, do hereby certify that I have this day served a copy of **CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO UNIFORM STATE COURT RULE 5.2** upon the following counsel of record via United States Mail with proper postage affixed thereon and addressed as follows:

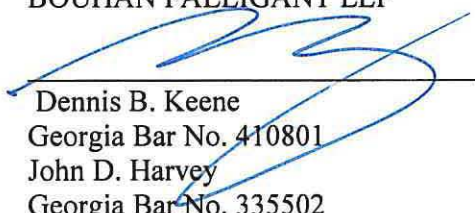
DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

This 30 day of August, 2018.

BOUHAN FALLIGANT LLP

One West Park Avenue
Savannah, GA 31401-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com


Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Defendant
Swing Transport, Inc.

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

CLERK OF SUPERIOR, STATE
AND JUDICIAL COURTS
FILED
2018 AUG 27 PM 2:22
HATIE HOLMES SULLIVAN
CLERK, RICHMOND CO., GA.
AND CO., GA.

RHONDA TAYLOR,)
)
PLAINTIFF,)
)
v.) CIVIL ACTION FILE NO.
) 2018RCSC00850
GEORGIA-PACIFIC, LLC)
)
FIRST DEFENDANT,)
)
SWING TRANSPORT, INC.)
)
SECOND DEFENDANT,)
)
JOHN DOE,)
)
THIRD DEFENDANT.)

CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO
UNIFORM STATE COURT RULE 5.2

I, the undersigned counsel for Defendant Swing Transport, Inc., certify that on this day I caused to have mailed a copy of (1) Defendant Swing Transport, Inc.'s Responses to Plaintiff's First Request For Production Of Documents; and (2) Defendant Swing Transport, Inc.'s Responses To Plaintiff's First Interrogatories upon the following counsel of record, via United States mail, with proper postage affixed thereon and addressed to:

DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

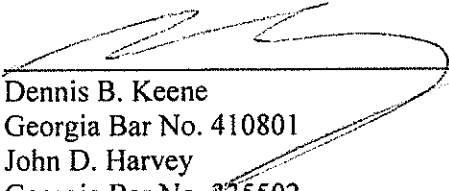
KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

[Signature on Following Page]

This 24 day of August, 2018.

One West Park Avenue
Savannah, GA 31401-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com

BOUHAN FALLIGANT LLP



Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Defendant Swing Transport, Inc.

Taylor v. Swing Transport, et al.
State Court of Richmond County
Civil Action No.: 2018RCSC00850
Signature Page to Rule 5.2 Certificate –
Swing Transport's Responses to Plaintiff's Discovery

IN THE STATE COURT OF RICHMOND COUNTY
FOR THE STATE OF GEORGIA

RHONDA TAYLOR,)	
)	
PLAINTIFF,)	
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v.)	CIVIL ACTION FILE NO.
)	2018RCSC00850
GEORGIA-PACIFIC, LLC)	
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SECOND DEFENDANT,)	
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JOHN DOE,)	
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THIRD DEFENDANT.)	

CERTIFICATE OF SERVICE

I, the undersigned counsel for Defendant, do hereby certify that I have this day served a copy of **CERTIFICATE OF SERVICE OF DISCOVERY PURSUANT TO UNIFORM STATE COURT RULE 5.2** upon the following counsel of record via United States Mail with proper postage affixed thereon and addressed as follows:

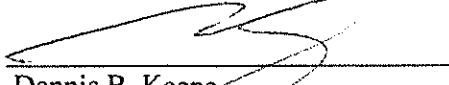
DAVID BELL LAW FIRM
David B. Bell
Post Office Box 1011
Augusta, GA 30903-1011

KILPATRICK TOWNSEND & STOCKTON
Joseph H. Huff
Laurel Payne Landon
1450 Green Street, Suite 230
Augusta, GA 30901

This 24th day of August, 2018.

One West Park Avenue
Savannah, GA 31401-2139
Telephone: 912-232-7000
Telefax: 912-233-0811
Email: dkeene@bouhan.com
jdharvey@bouhan.com

BOUHAN FALLIGANT LLP


Dennis B. Keene
Georgia Bar No. 410801
John D. Harvey
Georgia Bar No. 335502
Attorneys for Defendant
Swing Transport, Inc.

CLINTON COUNTY CO., GA
JUN 22 11:12:55

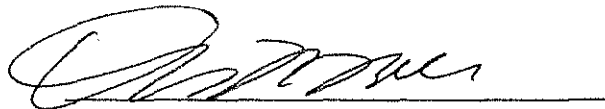
In accordance with the applicable rules and statutes governing practice and procedure relating to discovery, you are required to answer separately and fully in writing, under oath and within the time required by law, the Interrogatories attached hereto as Exhibit "A". These Interrogatories shall be deemed continuing so as to require supplemental answers if further information is obtained between the time answers are served and the time of trial.

As used herein, the term "you" shall refer to the Defendant, his agents, employees, officers, investigators and attorneys. In the event any information requested is privileged, Defendant is requested to state the grounds for such privilege.

As used herein, the term "identify" when used in reference to a person means that the Defendant is required to state the name, and last known address. When used with reference to a document, Defendant shall describe said document and state the person or persons who have custody thereof including the last known address and telephone number of such person or persons.

Further, as used herein, the term "document" shall refer to any written memorandum, letter report, statement, photograph, drawing, map, contract, or other written instrument or a copy of any of the foregoing in the event the copy is different from the original, plus any tape recording or other means of electronic or photographic reproduction.

This 21st day of June, 2018.



DAVID B. BELL
STATE BAR NO. 047750
Attorney for Plaintiff

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706)724-1882

EXHIBIT "A"

1. State your complete legal name for the past five (5) years.
2. Identify all persons known to you who have or claim to have knowledge of facts relevant to the issues formed by the pleadings in this action, and the incident referenced therein, including but not limited to the persons who loaded the truck and the person(s) who transported the truck from South Carolina to Augusta, Georgia.
3. Identify any expert witness(es) whom you expect to call at the trial of this case.
4. With respect to each such expert, please provide the following:
 - (a) The subject matter of which the expert is expected to testify;
 - (b) The substance of the facts and opinions to which the expert is expected to testify;
 - (c) A summary of the grounds for each opinion.
5. Do you contend that the negligence of any person, firm, corporation or other entity caused or contributed to the damages sought to be recovered by the plaintiff herein? If so, please identify each such person, firm, corporation or other entity and describe in detail the negligence and the manner in which such negligence contributed to the said damages. In this regard, please state every fact upon which you base your defense that plaintiff failed to exercise ordinary care for his own safety, failed to avoid the consequences of Defendant's alleged negligence, and was guilty of negligence which

was either the sole proximate cause of his injuries or was at least equal to if not greater than any negligence alleged against the Defendant.

6. Do you claim that there exists any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of any judgment which may be entered in this action or to indemnify or reimburse you for payments made to satisfy the judgment? If so, please state the name of the insurance business, provide the policy number, the policy limits and state whether or not such insurance business is providing you with a defense in this claim; and, if so, also please state whether there has been a reservation of rights made by the insurer.

7. Identify any person who has in any manner participated in any investigation pertaining to any issue arising out of the incident involved in this case. For each person identified in response to this interrogatory, state the substance of any facts or information acquired as a result of such person's participation in any such investigation.

8. Please state the name, addresses, telephone numbers and places of employment of all persons known to you, either from your investigation or from any investigation made on your behalf who have knowledge of the issues involved in this case.

9. Are you aware of the existence of any written, recorded or transcribed statements made by anyone concerning this action or the subject matter of this action? If so, please identify each such statement, the date taken, by whom taken and the names and addresses of all persons presently having copies of same.

10. List and describe in specific detail each and every document, piece of correspondence, report or other writing which contains information which concerns the subject matter of this action.

11. Identify any photographs, charts, diagrams, plats, drawings, moving pictures, videotapes, models or other depictions (whether prepared by you or not) which depict any scene, object or person which is or may be relevant to any matter involved in this case.

12. State in detail and in narrative form your version of the facts of the incident which is alleged in Plaintiff's complaint, giving specific details and proper sequence of events, including every factual contention upon which you base any defense as set out in your answer to said complaint.

13. Identify all eyewitnesses to the incident which gave rise to this lawsuit.

14. State whether Plaintiff, or any agent of Plaintiff, has made any statements in any form regarding any phase of the incident referred to in the captioned suit or the injuries resulting therefrom and give the name and address of the person or persons to whom each such statement was made, the date and form of each such statement, and the name and address of the person(s) presently having possession, custody, or control of each such statement.

15. If Defendant or any representative of Defendant obtained statements from any person who has or claims to have knowledge of any relevant facts concerning any of the issues involved in the captioned suit, state whether such statement was oral, written,

or recorded, and give the name and address of the person who gave the statement, the date and place the statement was made, the name and address of each person present when the statement was made, and the name and address of each person who has present custody of each written statement, recording of an oral statement or a transcript of a reported or recorded statement.

16. State whether you or anyone on your behalf prepared a report of the incident complained of. State whether you or anyone on your behalf filed a report of this incident with any party whomsoever, and give the name and address of the person with whom such report was filed and/or the name and address of the person who has custody of such report.

**EXHIBIT "B" :
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT**

Pursuant to the provisions of Official Code of Georgia Annotated Section 9-11-34, you are hereby requested to produce the documents described below, by mailing a copy of all such described documents to the undersigned attorney, David B. Bell, P. O. Box 1011, Augusta, Georgia, 30903-1011, within thirty (30) days following your receipt of this request.

1. Original or true copies of all policies of insurance identified in your response to Interrogatory No. 4 of Plaintiff's First Interrogatories which do or may provide any coverage as to any of the injuries or damages claimed in this action. This request directs itself to the entire policy.

2. All surveillance or investigatory material which depicts or attempts to depict or is claimed to depict any issue raised in this action.

3. All written, recorded or transcribed statements of any witness (including any expert witness) or other person (including Plaintiff or any agent of Plaintiff) concerning the subject matter of this action as identified in your responses to Interrogatories 7, 12, and 13 of Plaintiff's First Interrogatories.


4. All documents, correspondence, reports or other writings concerning the subject matter of this action identified in your response to Interrogatory No. 8 of Plaintiff's First Interrogatories.

5. All depictions of any scene, object or person which is or may be relevant to any subject matter of this action as identified in your response to Interrogatory No. 9 of Plaintiff's First Interrogatories.

6. All reports of this incident identified in your response to Interrogatory No. 14 of Plaintiff's First Interrogatories.

7. Any report identified in your answers to these Interrogatories.

This 21st day of June, 2018.



DAVID B. BELL
ATTORNEY FOR PLAINTIFF
STATE BAR NO. 047750

OF COUNSEL:

POST OFFICE BOX 1011
AUGUSTA, GEORGIA 30903-1011
(706) 724-1882